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July 21, 2017

SUBMITTED ELECTRONICALLY VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

Re: **Progress Report**

WT Docket No. 16-319, *Bresnan Communications, LLC, Request for Waiver*

Dear Ms. Dortch:

On December 21, the Wireless Telecommunications Bureau (“Bureau”) granted T-Mobile License LLC (“T-Mobile”) a waiver of Section 27.14(g)(1) of the rules in the above-referenced proceeding, finding that doing so would serve the public interest by enabling T-Mobile to bring new and advanced wireless services to citizens of Montana and Wyoming, many of whom reside in remote areas where entry of a new carrier would increase competition and consumer choice.^{1/}

Background

Since the Bureau issued the Waiver Letter, T-Mobile has aggressively acted to not only meet, but to exceed, the performance requirements the Bureau imposed. As a result, consumers in over 62% of the geographic area covered by one of the affected licenses are already recognizing the benefits of the additional competition the Bureau envisioned, and months earlier than envisioned by the waiver. By the end of the year, based on the steps it has already taken, described below, T-Mobile will exceed the next milestone by providing between 30 and 40% *more* coverage than the Bureau required (for a total of up to 75%) in the remaining two licensed areas. T-Mobile is also making good on its commitment to not only provide facilities-based coverage to Montana, but to serve customers in the state by establishing a retail presence. T-Mobile has already opened four retail locations in Montana and has plans to open five additional locations late this year or in the first quarter of 2018 – making its services more accessible and providing jobs in the state. The Bureau was exactly right when it found that granting T-Mobile a waiver would

^{1/} Letter from Roger S. Noel, Chief, Mobility Division, Wireless Telecommunications Bureau, to Steve B. Sharkey, T-Mobile License LLC, 31 FCC Rcd 13379, WT-Docket No. 16-319, rel. Dec. 21, 2016 (“Waiver Letter”).

promote access to spectrum by, and provision of service to, consumers -- especially in rural areas.

The Waiver Letter required T-Mobile to, among other things, submit a Progress Report describing the steps that it has taken to ensure that it will be able to satisfy the 40 Percent Coverage Benchmark and 70 Percent Coverage Benchmarks (as those terms are defined in the Waiver Letter) and certifying that it expects to meet those benchmarks.^{2/} The Waiver Letter affected three licenses. Two of those licenses (WQJQ805 (Billings) and WQJQ806 (Great Falls)) cover what T-Mobile and Bureau referred to as the eastern license areas and represent where T-Mobile had not previously provided service.

Steps Taken to Meet Coverage Benchmarks

The following are the steps T-Mobile has taken to satisfy both the 40 Percent Coverage Benchmark and 70 Percent Coverage Benchmarks for those two license areas:

- *Site Identification and Construction* – T-Mobile has identified over 180 “search rings” within which transmitter facilities will be located. Of those, slightly over half have existing sites available through nationwide tower site operators/managers with whom T-Mobile has an existing master lease agreement. Approximately one quarter of the sites will be built for T-Mobile’s use and in slightly less than one quarter of the total cases, T-Mobile will use the tower site of a company with whom it does not have a master site lease. In fact, construction has already started on sixteen sites and three more are anticipated to start before the end of the week.
- *RF Design, Zoning Approval* – T-Mobile has completed preliminary radio frequency design for over 95% of the planned sites. It has applied for and obtained zoning and building approvals for over half of the sites that will be built for T-Mobile as part of the network.
- *Lease Negotiation* -- Of the over 180 sites T-Mobile plans to use for the network, it expects to have over 95% under lease by the end of this year, with the remainder under lease in 2018.
- *Backhaul Planning* – T-Mobile has also begun to plan for backhauling traffic from the identified sites. It expects that traffic from nearly three-quarters of the sites will be backhauled using fiber, with the remainder backhauled using microwave. T-Mobile has already contracted for backhaul for approximately three quarters of the sites that will be connected via fiber. To the extent that fiber is not available for backhaul, detailed site surveys and engineering have been performed for sites that will be backhauled with microwave

^{2/} Waiver Letter at 6.

- *Service Award* – T-Mobile has selected an original equipment manufacturer (“OEM”) to be the radio equipment supplier and a service provider to perform the construction work for the 180 planned sites.
- *Coverage Estimates* -- Based on this planning, T-Mobile expects that it will cover as much as 70% of the required geography for BEA 144 (Billings) and as much as 70% of the required geography for BEA 145 (Great Falls) by the end of this year – well in excess of the required 40% coverage. By the end of 2018, T-Mobile expects to cover over 90% of the non-federal geography of both eastern license areas, also well in excess of the 70% required. While these goals are aggressive, T-Mobile nevertheless expects to well exceed the mandated coverage requirements for BEAs 144 and 145 by the end of 2017 and 2018.

The remaining license covered by the Waiver Letter, is WQJQ807 (CMA527), referenced by T-Mobile and the Bureau as the western license area. As the Commission is aware, T-Mobile has already exceeded the 40 Percent Coverage Benchmark for that license. Even though it was required to cover only 35% of the area, it reported that it already covers 62% of the area—nearly twice what was required.^{3/} Accordingly, for the western license area, only incremental steps are required for T-Mobile to meet the 70 Percent Coverage Benchmark. In fact, T-Mobile has determined that only three additional sites are needed to satisfy that requirement. T-Mobile has identified and completed radiofrequency design for those sites.

In addition to meeting the benchmarks, T-Mobile has continued to demonstrate its commitment to bring wireless services to Montana by opening four retail outlets in the state over the past three months. It expects to open five additional stores by the end of this year or in the first quarter of 2018.

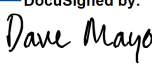
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Pursuant to the Waiver Letter and Section 1.16 of the Commission’s rules, I hereby declare under penalty of perjury that the foregoing is true and correct. I further certify that T-Mobile expects to meet the 40 Percent Coverage Benchmark and 70 Percent Coverage Benchmarks.

Executed as of the date above.

DocuSigned by:

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Dave Mayo
 Senior Vice President – Technology Strategy,
 Finance and Development

^{3/} See ULS File No. 0007667068.